

Proboszcz, Angie

From: Meer, Daniel
Sent: Wednesday, December 16, 2015 12:42 PM
To: Manzanilla, Enrique; Lawrence, Kathryn; Allen, HarryL; Johnstone, Jeremy
Cc: Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene; Zabel, Allan
Subject: RE: Alison Canyon Situational Update
Attachments: Aliso Canyon Update 12.16.docx

Follow Up Flag: Follow up
Flag Status: Flagged

[Use this version.](#) Dan

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
415.971.6792 (C)

From: Meer, Daniel
Sent: Wednesday, December 16, 2015 12:33 PM
To: Manzanilla, Enrique; Lawrence, Kathryn; Allen, HarryL; Johnstone, Jeremy
Cc: Lindsay, Nancy; Irizarry, Gilberto; Schumann, Jean; Lee, Eugene
Subject: Alison Canyon Situational Update

Update for 16 December 2015. New information is shaded yellow.

Dan

Daniel A. Meer, Assistant Director
Superfund Division
Emergency Response, Preparedness and Prevention Branch
415.972.3132 (O)
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PRE DECISIONAL – ATTORNEY CLIENT PRIVILEGE – DO NOT RELEASE

Southern California Gas Company Methane Release

Aliso Canyon Natural Gas Storage Facility

16 December 2015

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in the northern San Fernando Valley, Los Angeles County. SoCal Gas injects natural gas into the abandoned oil reservoir for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Utilities.

The Aliso Canyon storage facility is located near Porter Ranch, an affluent residential community of approximately 30,000 people. The nearest Porter Ranch residents that are being affected live approximately 1 mile away and 1200 feet below the leaking wellhead.

The Aliso Canyon facility contains 115 gas withdrawal/injection wells and the well that is leaking, Well SS 25, is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet) of natural gas, one of the largest storage facilities in the United States.

Levels of methane, the principal component of natural gas, are being monitored in the residential areas and currently do not represent a significant public health threat.

Current Status:

Well Head Prep: Work continues on preparing a walkway to allow safe access to the well head. They are building a 100 foot bridge for this purpose. High northerly winds are making it difficult to run equipment to the wellhead, so progress is slow.

Relief Wells: Relief well is on schedule and is currently drilled to 3850'. Casing is in the ground, cemented and logged, to approximately 1845'. There were some anomalies on the well log and the cemented section will be re logged. A second relief well site has been identified and grading has begun to prepare the drill pad.

Kill Shot Prep: They continue grading the well pad and bringing in equipment for the next 'top kill' attempt. This includes pumps and the heavy mud that they plan to pump into the well.

Pressure Regulation: SoCal Gas continues to withdraw gas from the facility at approximately 1 bcf/day to reduce pressure around SS-25. The top hole pressure is estimated at 1420 psi and bottom hole pressure is estimated at 1800 psi.

SoCal Gas Company has a team of well control experts that are attempting to plug the leaking well. However complex geology of the area is complicating the effort. SoCal Gas is currently

drilling two relief wells that will be used to divert gas flow away from the leaking well, and subsequently heavy muds and fluid will be pumped into the leaking well, to stop the methane release (bottom kill). The leaking well will then be permanently plugged with cement. The drilling operation continues around the clock and the relief well effort is estimated to take 3-4 months to complete. SoCal Gas is also preparing for a 'top kill' attempt, possibly early next week. They have attempted several top kills without success.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels that are substantially below the flammability limit and that do not represent a current health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness and residents have reported effects that are consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing a health effects to some Porter Ranch residents.

Regulatory Actions: A large group of state and local regulatory agencies and jurisdictions are involved with the response to this methane leak.

State Agencies:

Division of Oil, Gas and Geothermal Resources, Department of Conservation,
Natural Resources Agency

California Office of Emergency Services;

California Environmental Protection Agency.

Local Agencies:

Los Angeles County Certified Unified Program Agency (LA County CUPA)

Los Angeles County Fire/HazMat

City of Los Angeles

South Coast Air Quality Management District (SCAQMD)

Los Angeles County Department of Public Health

The Natural Resources Agency, DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas's plans for stopping the leak.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in the process of relocating (496). SoCal Gas has established a

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency with expertise in plume and atmospheric modeling.

Next Steps:

OSCs Moxley and Musante attended a site tour on 12/16 with LA County Fire/HazMat, Lawrence Livermore National Laboratory and the California Department of Conservation.

The Region's CAA 114 information request should be ready for signature by COB 12/17.

The Region is holding daily situational update calls during the work week, starting on 12/17, at 1100 Pacific time. The Region is also participating in the daily ops call with SoCal Gas.

The Emergency Response, Preparedness and Prevention Branch has assigned an on-scene coordinator and an emergency preparedness and prevention inspector to sit in on the daily operational calls and provide daily summaries. We will develop a staffing plan that will describe how we might bring USEPA assets to assist, if we get a request from California.

[REDACTED]

On 16 December two OSCs will participate with California agencies (DOGGR, Department of Conservation) and representatives from the National Labs (Lawrence Berkeley and Lawrence Livermore) on an informational site tour of the Aliso Canyon leak site.

Proboszcz, Angie

From: Maier, Brent
Sent: Monday, January 04, 2016 12:03 PM
To: Haman, Patricia;Levine, Carolyn
Cc: Lawrence, Kathryn;Meer, Daniel;Johnstone, Jeremy;Quast, Sylvia;Keener, Bill
Subject: RE: Aliso Canyon Gas Leak - Sen. Feinstein Staff Inquiry
Attachments: EPA Letter to Dennis Arriola Request for Info.pdf; Letter to The Hon. Brad Sherman.pdf; Control Information for AL-16-000-2291.pdf; Rep. Brad Sherman - Letter to EPA Regarding Natural Gas Leak in Aliso Ca....pdf

Importance: High

Follow Up Flag: Follow up
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Pat/Carolyn –

Our Regional Counsel, Sylvia Quast and I did a call last week with some of Senator Feinstein's staff including Ken Rooney in the DC office and Kevin Chang in the Senator's Los Angeles office. The media has been reporting that we have opened an investigation, but it can more accurately be characterized that we have sent an information request to SoCal Gas under Section 114 of the CAA. Our Office of Regional Counsel is looking into whether there may be any other jurisdiction under some other authorities for us to get more involved, but I have yet to hear where that review currently stands. SoCal Gas had until December 31st to submit their responses to our Section 114 information request, and our Office of Regional Counsel received word late in the day of December 30th that SoCal Gas would submit some information, but would need some additional time to submit other requested information, but that it was their highest priority. I am copying my colleagues in our Superfund Division's Emergency Response, Prevention and Preparedness Office and our Regional Counsel on this reply to make them aware of this new Sen. Feinstein inquiry.

I am also attaching copies of our 114 information request and our response to an incoming letter from Congressman Brad Sherman on the Aliso Canyon gas leak for your reference.

Brent Maier

Congressional Liaison
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St. (OPA-3)
San Francisco, CA 94105
Ph: 415.947.4256

From: Haman, Patricia
Sent: Monday, January 04, 2016 11:41 AM
To: Levine, Carolyn <Levine.Carolyn@epa.gov>; Maier, Brent <Maier.Brent@epa.gov>
Subject: FW: Aliso Canyon Gas Leak

I am forwarding this to the two of you so we can discuss how best to handle it. Thanks, Pat

Patricia Haman
Office of Congressional Affairs

U.S. EPA
202-564-2806

From: Higgins, Trevor (Feinstein) [mailto:Trevor_Higgins@feinstein.senate.gov]
Sent: Monday, January 04, 2016 2:22 PM
To: Haman, Patricia <Haman.Patricia@epa.gov>
Subject: Aliso Canyon Gas Leak

Hi Pat,

I read today that the EPA may be opening an investigation into the ongoing natural gas leak at Southern California Edison's Aliso Canyon storage facility, with the aim of suggesting new solutions. Is this correct? Are there penalties available under the law if the utility is found to be negligent? Does the EPA have a judgment on the health impacts of exposure to mercaptans or other gases involved in the leak?

Also, for background, can you explain why storage facilities such as these were excluded from the Risk Management Program under 40 CFR 68.3?

Thanks,

Trevor

Trevor Higgins
Legislative Assistant
Senator Dianne Feinstein
331 Hart Senate Office Building
Washington, DC 20510
202.224.3841

Proboszcz, Angie

From: Johnstone, Jeremy
Sent: Monday, January 04, 2016 3:04 PM
To: Lawrence, Kathryn
Subject: RE: Aliso Canyon Natural Gas Leak Update 12-30-2015

Follow Up Flag: Follow up
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Thx

Jeremy Johnstone
Environmental Engineer
Emergency Prevention and Preparedness Section (Mail Code SFD-9-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Tel: 415-972-3499
Cell: 415-816-6584
email: johnstone.jeremy@epa.gov

From: Lawrence, Kathryn
Sent: Monday, January 04, 2016 3:02 PM
To: Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>
Subject: RE: Aliso Canyon Natural Gas Leak Update 12-30-2015

Kathryn Lawrence
Chief, Emergency Prevention and Preparedness
Superfund Division, EPA Region 9
(415) 972-3039

From: Johnstone, Jeremy
Sent: Monday, January 04, 2016 2:58 PM
To: Lawrence, Kathryn <Lawrence.Kathryn@epa.gov>
Subject: RE: Aliso Canyon Natural Gas Leak Update 12-30-2015

Would help...

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From: Lawrence, Kathryn
Sent: Monday, January 04, 2016 1:10 PM
To: Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>
Subject: Re: Aliso Canyon Natural Gas Leak Update 12-30-2015

Will do

Kathryn Lawrence
Emergency Prevention and Preparedness Programs
EPA Region 9
4159723039

Sent from my iPhone

On Jan 4, 2016, at 1:08 PM, Johnstone, Jeremy <Johnstone.Jeremy@epa.gov> wrote:

Can you please send this to me in Word format? Thx

Jeremy Johnstone
Environmental Engineer
Emergency Prevention and Preparedness Section (Mail Code SFD-9-3)
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75 Hawthorne Street
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To: Johnstone, Jeremy <Johnstone.Jeremy@epa.gov>
Cc: Meer, Daniel <Meer.Daniel@epa.gov>
Subject: Fwd: Aliso Canyon Natural Gas Leak Update 12-30-2015

Kathryn Lawrence
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Sent from my iPhone

Begin forwarded message:

From: "Lawrence, Kathryn" <Lawrence.Kathryn@epa.gov>
Date: December 30, 2015 at 5:08:25 PM PST
To: "Meer, Daniel" <Meer.Daniel@epa.gov>, "Eoc, Epahq" <Eoc.Epahq@epa.gov>, "Johnson, Kathleen" <Johnson.Kathleen@epa.gov>, "Keener, Bill" <Keener.Bill@epa.gov>, "Lee, Eugene" <Lee.Eugene@epa.gov>, "Lindsay, Nancy" <Lindsay.Nancy@epa.gov>, "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>,

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Subject: Aliso Canyon Natural Gas Leak Update 12-30-2015

Updates are in yellow.

Note recent news regarding the CAA 114 request from ORC/Sylvia Quast:

SoCal Gas's lawyers just called us to let us know that they will not be able to provide us with all of the requested information by the end of the day tomorrow, but that they will provide us with as much as possible and will continue to provide us with the remainder as they receive it. We emphasized to them the importance of getting the information as soon as possible, to which they responded by saying it was their highest priority.

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Can you please also send me the 12/31 update? Thx

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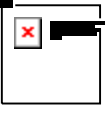
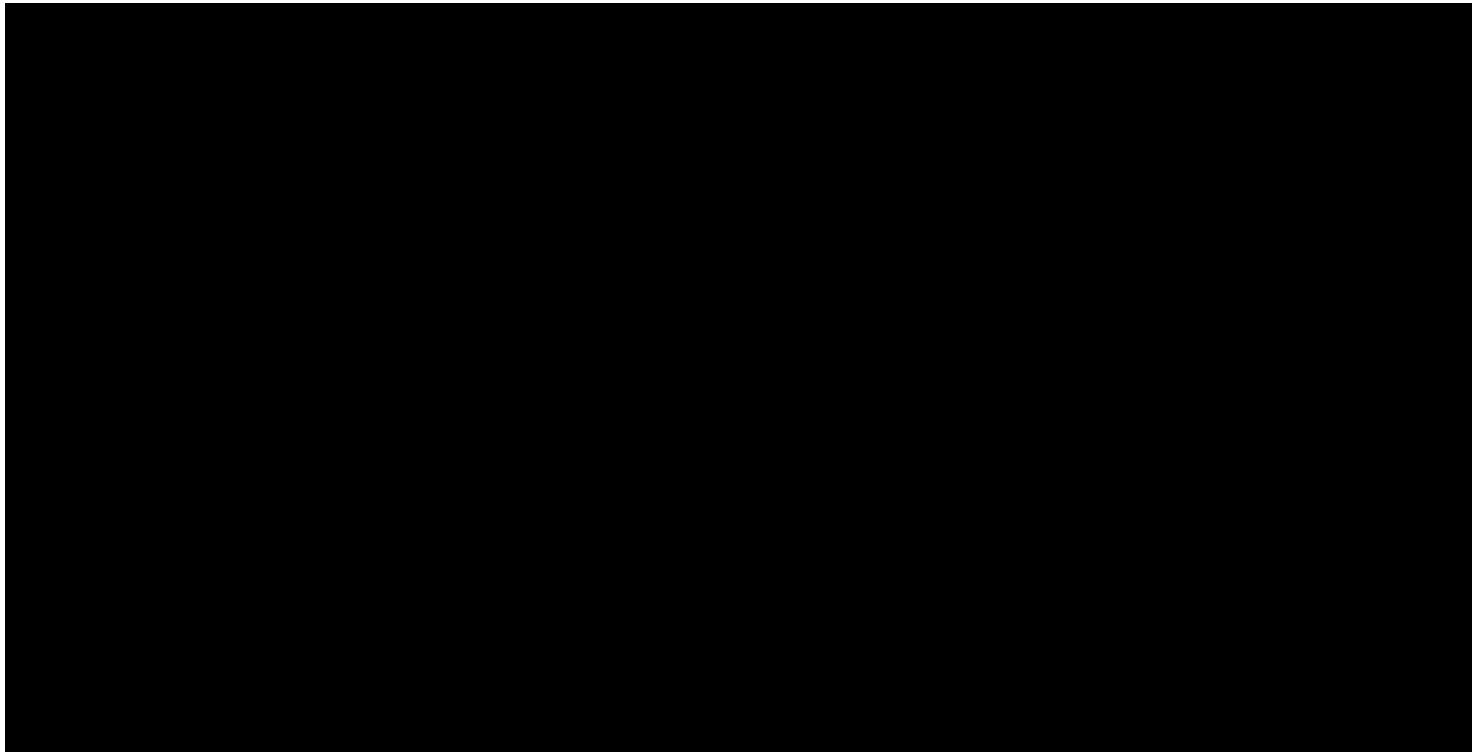
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Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Monday, January 04, 2016 12:27 PM
To: Jordan, Deborah
Subject: FW: Aliso Canyon Gas Leak - Sen. Feinstein Staff Inquiry
Attachments: EPA Letter to Dennis Arriola Request for Info.pdf; ATT00001.htm; Letter to The Hon. Brad Sherman.pdf; ATT00002.htm; Control Information for AL-16-000-2291.pdf; ATT00003.htm; Rep. Brad Sherman - Letter to EPA Regarding Natural Gas Leak in Aliso Ca....pdf; ATT00004.htm

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Per my previous email.

Enrique Manzanilla
Director, Superfund Division
US EPA Region 9 - Pacific Southwest
(415) 972 3843

From: Lawrence, Kathryn
Sent: Monday, January 04, 2016 12:17 PM
To: Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
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Kathryn Lawrence
Emergency Prevention and Preparedness Programs
EPA Region 9
4159723039

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Subject: Aliso Canyon Gas Leak

Hi Pat,

I read today that the EPA may be opening an investigation into the ongoing natural gas leak at Southern California Edison's Aliso Canyon storage facility, with the aim of suggesting new solutions. Is this correct? Are there penalties available under the law if the utility is found to be negligent? Does the EPA have a judgment on the health impacts of exposure to mercaptans or other gases involved in the leak?

Also, for background, can you explain why storage facilities such as these were excluded from the Risk Management Program under 40 CFR 68.3?

Thanks,

Trevor

Trevor Higgins
Legislative Assistant
Senator Dianne Feinstein
331 Hart Senate Office Building
Washington, DC 20510
202.224.3841



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Via email (DArriola@semprautilities.com) and Certified Mail

CERTIFIED MAIL NO. 7015 0640 0007 0638 0669
RETURN RECEIPT REQUESTED

In Reply Refer to:
Southern California Gas Company Aliso Canyon Natural
Gas Release

Dennis Arriola
President and CEO
Southern California Gas Company
555 W 5th St
Los Angeles, CA 90013-1010

RE: Request for Information, Southern California Gas Company Aliso Canyon Natural Gas
Release

Dear Mr. Arriola:

The United States Environmental Protection Agency ("EPA") is conducting an investigation of the natural gas release (the "Release") at the Southern California Gas Company (the "Company's") Aliso Canyon Natural Gas Storage Facility located at 12801 Tampa Ave. in Northridge, CA, (the "Facility") that was discovered on or about October 23, 2015.

With this letter and its enclosure ("Information Request"), EPA seeks additional information and documents concerning the Company's compliance with the Clean Air Act, 42 U.S.C. §§ 7401 *et seq* ("CAA"). This Information Request is authorized pursuant to Section 114 of the CAA, 42 U.S.C. § 9614. Your responses to this letter must be made by a letter, signed by a person or persons duly authorized to represent the Company. Electronic copies of submittals are preferred. EPA believes that much of the requested information is, or should be, readily available at the Facility. If there are any responsive documents or information which you are unable to provide, please provide an explanation for, and documentation of reasons for, the Company's inability to provide that information. Please send your submittals so that they are received by no later than **December 31, 2015**. Address your response to:

Kathryn Lawrence (SFD-9-3)
Section Chief
Emergency Prevention and Preparedness Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
lawrence.kathryn@epa.gov

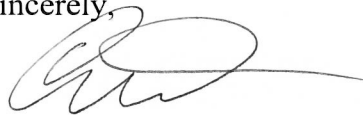
Please note that, pursuant to regulations located at 40 CFR Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information as defined in 40 CFR § 2.201(c). Asserting a business confidentiality claim does not relieve you from the obligation to fully respond to this letter. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. In addition, EPA has not waived any rights to take enforcement action for past or future violations.

The Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action being taken in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and administrative penalties of up to \$37,500 per day of noncompliance. In addition, the submission of knowingly false or misleading statements may be punished by a fine pursuant to Title 18 of the U.S. Code, or by imprisonment for not more than two years, or both.

This request for information is not subject to review by the Office of Management and Budget ("OMB" under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. §§ 3502(3), 3507, and 3512. *See, also*, 4 CFR §§ 1320.3(c), 1320.5, and 1320.6(a). Furthermore, this request is exempt from OMB review under the Paperwork Reduction Act because it is part of an investigation of a specific individual or entity. 44 U.S.C. § 3518(c)(1); 5 CFR § 1320.4.

If you have questions about the legal aspects of this Information Request, please contact Ms. Letitia Moore, U.S. EPA Assistant Regional Counsel, at (415) 972-3928 or moore.letitia@epa.gov. The Region IX technical contact for this information request is Kathryn Lawrence, who may be reached at (415) 972-3039 or johnstone.jeremy@epa.gov. We thank you in advance for your cooperation.

Sincerely,



Enrique Manzanilla, Director
Superfund Division

Enclosures (2)

1 - Information Request

2 - Confidential Business Information

cc (via email w/enclosures):

Jimmie Cho, SoCalGas

John Geroch, DOGGR

Mohsen Nazemi, SCAQMD

Alice Reynolds, CalEPA

Bill Jones, LACFD

Gregory Reynar, LAFD



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 1

Information Request
Southern California Gas Co.

Please provide the information requested in the Information Request section of this Enclosure such that it is received by no later than **December 31, 2015**.

INSTRUCTIONS

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form
3. All responsive documents must be: a) provided as an accurate and legible copy in a searchable PDF file format; b) submitted on via electronic media (thumb drive, CD, or DVD); and c) number stamped in sequential order (e.g. BATES stamped). Furthermore, data should be provided in spreadsheet format (e.g., Excel format), when available, rather than as image or PDF formats.
4. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
5. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice. [Some EPA Regions refer to an enclosure such as the one I've included as "Enclosure 4" here for further discussion of the CBI issue and process].
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.

7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding the information.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean the Southern California Gas Co., or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by the Company at the Aliso Canyon Natural Gas Storage Facility property or properties located at 12801 Tampa Ave. in Northridge, CA, or contiguous or adjacent to that address.

3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.

5. "Release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, extremely hazardous substances, regulated substances, air pollutant, pollutants or contaminants. "Release" shall include "accidental release" as that term is defined by 40 C.F.R. § 68.3.

7. "Standard Operating Procedure" or "SOP" means any express method or series of protocols to be followed routinely for the performance of designated operations or in designated situations by you or your subcontractors.

8. "Well SS 25 Release" shall mean the Release of odorized natural gas from Facility Standard Sesnon Well SS 25 that commenced on or about October 23, 2015.

9. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, 40 CFR Part 302, 40 CFR Part 355 or 40 CFR Part 372, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

1. Provide the following general information:
 - a. A Facility map and plot plan, to include the well pad for Standard Sesnon Well 25 ("Well SS 25");
 - b. A description of the Facility and operations;
 - c. A management organizational chart for the Facility (include identification of personnel with environmental responsibilities); and
 - d. Descriptive information about any/all other natural gas storage fields owned or operated by the Company and/or its parent corporation.
2. With respect to the Well SS 25 Release provide copies of all submittals made to any local, state or federal agencies relating to the Release as of the date of the response to this Information Request.
3. Unless otherwise provided in response to Item 2 above, provide the following regarding the Well SS 25 Release. If provided in in response to Item 2 above, identify the corresponding document and page numbers.
 - a. A map or other depiction showing, as well as a description of, the point(s) of the Release;
 - b. A description of the cause of the Release, including all known and/or suspected root causes and contributory factors;
 - c. Design specifications for Well SS 25;
 - d. A detailed history of physical changes or modifications made to Well SS 25, including the dates such modifications were implemented and the purpose for which the modifications were made;
 - e. A description of the Company's mechanical integrity program for the inspection, testing and preventive maintenance for Well SS 25, including leak detection;
 - f. All documents that describe Standard Operating Procedures used in the inspection, testing and preventive maintenance of Well SS 25, including leak detection;
 - g. A listing of recognized and generally accepted good engineering practices, used in the development and implementation of the Company's inspection, testing and preventive maintenance of Well SS 25;
 - h. Inspection, maintenance, and leak detection records for Well SS 25 from January 1, 2012 to the present;

- i. All documents that describe Standard Operating Procedures used for accident mitigation or emergency response regarding any risks associated with the maintenance and operation of Well SS 25 or other similarly-situated wells;
- j. A description of current fire safety/prevention measures being implemented both at the Release point(s) and at the Well SS 25 wellhead;
- k. A description of current Incident Command Structure (ICS) organizational structure (ICS 207 or equivalent);
- l. Identification of any/all incident-specific website(s) that any safety and/or regulatory agencies have current access to. Provide access to EPA;
- m. Identify and provide copies of any notifications of the Release made to public agencies, including agency name; date, time and method of notification; whom contacted; and notification/report number (as applicable);
- n. Copies of the Company's policies and procedures with respect to public agency notifications of natural gas leaks at the Facility;
- o. Company-prepared estimates of release rates to the atmosphere (daily, weekly, monthly, and/or yearly) for natural gas, total volatile organic compounds (VOCs) (as defined under 40 CFR § 51.100) and total reduced sulfur (TRS) from Well SS 25 during the Well SS 25 Release, with supporting documentation of methodology/methodologies employed in arriving at estimate(s); and
- p. A description of all activities undertaken, as of the date of your response to this Information Request, to mitigate the rate and quantity of natural gas released during the Well SS 25 Release.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 2

**Confidential Business Information (CBI)
Assertion and Substantiation Requirements**

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R.

§ 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R.

§ 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Letitia Moore
Assistant Regional Counsel
U.S. EPA Region 9
75 Hawthorne St.
San Francisco, CA 94105
Moore.letitia@epa.gov

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

The Honorable Brad Sherman
United States House of Representatives
1030 Longworth House Office Building
Washington, DC 20515

Dear Representative Sherman:

Thank you for your letter of December 10, 2015, to Administrator Gina McCarthy regarding the gas leak at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility in Aliso Canyon, Los Angeles County. Administrator McCarthy has asked me to respond on her behalf.

The U.S. Environmental Protection Agency shares your concern about the public health and environmental effects of the gas release and has already been investigating the incident. In addition to sending an information request under the authority of the Clean Air Act to SoCal Gas on December 18, U.S. EPA Region 9 is participating in daily operational calls with State and local regulators to stay abreast of developments in controlling the gas release and assisting local residents. Two Region 9 on-scene coordinators toured the Aliso Canyon site with the Los Angeles County Fire and Hazardous Materials Unit and representatives from Lawrence Livermore National Laboratory.

Given that the Aliso Canyon Natural Gas Storage Facility is regulated under the federal Pipeline Safety Act, U.S. EPA also contacted the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration regarding its authorities to take action. We are in contact with the California Public Utilities Commission (CPUC) and the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). DOGGR has issued two orders to SoCal Gas, requiring it to provide information on the leaking well, develop plans for expeditiously capturing the escaping gas, stopping the leak, and communicating with state and local regulators. The CPUC is also conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root cause analysis of the well blowout.

Local authorities such as the South Coast Air Quality Management District and the Los Angeles County Department of Public Health have also issued orders to SoCal Gas. The latter order requires SoCal Gas to provide temporary relocation to residents, and hundreds of households have either relocated or are in the process of relocating. SoCal Gas has established a community center in the nearby Porter Ranch community to answer questions and assist residents with temporary relocation and claims.

We are pleased that our state and local partners are taking these important steps to protect public health and safety, and we will continue to investigate and monitor the situation. We stand ready to help in any way if our assistance is requested pending the results of our investigation.

If you have further questions, please have your staff contact EPA's Congressional Liaison, Brent Maier, at (415) 947-4256, maier.brent@epa.gov, or Dan Meer, Assistant Director for Emergency Response, Preparedness and Prevention, at (415) 972-3132, meer.daniel@epa.gov.

Sincerely,

Alex. Strauss
for Jared Blumenfeld *24 Dec. 2015*



Correspondence Management System

Control Number: AL-16-000-2291

Printing Date: December 14, 2015 07:59:52



Citizen Information

Citizen/Originator: Sherman, Brad

Organization: U.S. House of Representatives

Address: 1030 Longworth House Office Building, Washington, DC 20515

Constituent: N/A

Committee: N/A

Sub-Committee: N/A

Control Information

Control Number: AL-16-000-2291

Alternate Number: N/A

Status: Pending

Closed Date: N/A

Due Date: Dec 25, 2015

of Extensions: 0

Letter Date: Dec 10, 2015

Received Date: Dec 11, 2015

Addressee: AD-Administrator

Addressee Org: EPA

Contact Type: LTR (Letter)

Priority Code: Normal

Signature: RA-R9-Regional Administrator - Region 9

Signature Date: N/A

File Code: 404-141-02-01_141_a(2) Copy of Controlled and Major Correspondence Record of the EPA Administrator and other senior officials - Electronic.

Subject: REQUEST THAT THE EPA IMMEDIATELY INVESTIGATE THE UNRESOLVED GAS LEAK AT THE SOUTHERN CALIFORNIA GAS CO.

Instructions: RA-R9-Prepare draft response for signature by the Regional Administrator for Region 9

Instruction Note: N/A

General Notes: N/A

CC: OAR - Office of Air and Radiation -- Immediate Office
Patricia Haman - OCIR-CA-AT

Lead Information

Lead Author: N/A

Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Cassandra Eades	OCIR	R9	Dec 11, 2015	Dec 25, 2015	N/A
Instruction: RA-R9-Prepare draft response for signature by the Regional Administrator for Region 9					

Supporting Information

Supporting Author: N/A

Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

History

Action By	Office	Action	Date
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Correspondence Management System

Control Number: AL-16-000-2291

Printing Date: December 14, 2015 07:59:52



Action By	Office	Action	Date
Cassandra Eades	OCIR	Assign R9 as lead office	Dec 11, 2015

Comments

Commentator	Comment	Date
No Record Found.		



BRAD SHERMAN
UNITED STATES CONGRESS

PH: (202) 225-5911
FAX: (202) 225-5879

December 10, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Administrator McCarthy:

I am writing to request that the Environmental Protection Agency immediately investigate the unresolved gas leak at the Southern California Gas Co. natural gas storage facility in Aliso Canyon. I ask that the Environmental Protection Agency investigate the cause of the leak, and propose action to mitigate the threat to public health, and expedite the leak's repair.

For over six weeks, noxious gas emanating from a leaking well has been sickening residents of the Porter Ranch neighborhood of Los Angeles, causing headaches, nose bleeds and dizziness¹². A preliminary Environmental Health Assessment by the Los Angeles County Department of Public Health has confirmed the health threat, noting the "neurological, gastrointestinal, and respiratory symptoms that may result from the inhalation." More than 2,800 residents have inquired about relocation and over 1,200 have already relocated. The situation will only worsen, as Southern California Gas Co. estimates that the leak could continue for months.

The California Air Resources Board estimates that the leak is responsible for nearly 25% of California's daily methane emissions; as you know, methane is an important cause of global climate change. I am also concerned about reports of radon gas and benzene being released into the air.

An immediate investigation has become necessary due to the prolonged period of the leak, the apparent health impacts, and the lack of certainty over when the leak can be stopped.

I am aware that 40 CFR § 68.3 excludes storage facilities from regulation under the Risk Management Program. However, we believe that 42 U.S. Code § 7603, which allows the EPA to "issue such orders as may be necessary to protect public health or welfare or the environment," controls the determination here. A statutory provision inherently trumps any regulation. To be even clearer, the statute explicitly states, "Notwithstanding any other provision of this chapter, the Administrator... may... take such other action as may be necessary."

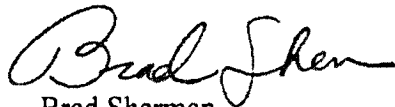
¹ Mendoza, Javier. "Natural gas leak that's sickening Valley residents could take months to fix." *Los Angeles Times*. November 20, 2015.

² Favot, Sarah. "Health officials: Porter Ranch gas leak may cause long-term health effects." *Los Angeles Daily News*. December 2, 2015.

Accordingly, it seems clear that you have the statutory authority to:

1. Commence an investigation,
2. Determine all necessary steps to protect the environment and public health, and
3. Require Southern California Gas Co. to implement all such steps.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Sherman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brad Sherman
Member of Congress

CC:

Department of Oil, Gas & Geothermal Resources
California Public Utilities Commission
South Coast Air Quality Management District
Los Angeles City Councilman Mitchell Englander
Los Angeles County Supervisor Michael Antonovich

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

Current Status: SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.

SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

Regulatory Actions:

State Agencies: Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

Local Agencies: Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

Federal Actions:

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

Congressional Interest:

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]

Proboszcz, Angie

From: Manzanilla, Enrique
Sent: Tuesday, December 22, 2015 11:50 AM
To: Cheatham, Reggie;Natarajan, Nitin;Tulis, Dana
Cc: Jordan, Deborah;Adams, Elizabeth;Johnson, Kathleen;Quast, Sylvia;Meer, Daniel;Moore, Letitia
Subject: Fwd: Aliso Canyon - [REDACTED]
Attachments: Aliso Canyon - [REDACTED]

Follow Up Flag: Follow up
Flag Status: Flagged

Looping.....

Sent from my iPhone

Begin forwarded message:

From: "Blumenfeld, Jared" <BLUMENFELD.JARED@EPA.GOV>
Date: December 22, 2015 at 11:43:22 AM PST
To: "Strauss, Alexis" <Strauss.Alexis@epa.gov>, "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>
Subject: FW: Aliso Canyon - [REDACTED]

From: Blumenfeld, Jared
Sent: Monday, December 21, 2015 5:10 PM
To: Matthew R. Fritz (fritz.matthew@epa.gov) <fritz.matthew@epa.gov>
Subject: Aliso Canyon - [REDACTED]

Proboszcz, Angie

From: Zito, Kelly
Sent: Tuesday, January 12, 2016 5:08 PM
To: Keener, Bill;Glenn, William;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 12, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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Politico: Reporter Elana Schor was looking for an update on EPA's involvement in the natural gas leak at Southern California Gas Company's Aliso Canyon facility. Sent statement explaining state's lead on response and EPA's ongoing review of SoCalGas documents submitted. CLOSED. (v). Contact: Kelly Zito

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Santa Maria Sun: Reporter Brenda Swanston was looking to speak with someone about imidacloprids and under what circumstances they have a negative effect On the bee population and potential action the EPA might take in response to its assessment. Referred to HQ. OPEN. (V). Nahal Mogharabi/Cathy Milbourn.

Bloomberg: Reporter Mark Chediak was looking to see if EPA regulates the well responsible for the leak at Porter Ranch. Referred him to DOGGR and PHMSA. Also sent him copies of the Sherman letter and our 114 information request. SFUND. CLOSED. (V). Nahal Mogharabi.

PRESS RELEASE issued:

Puna Geothermal Venture CAFO – Press release was issued today on our settlement with PGV over Clean Air Act chemical safety violations at its geothermal energy plant in the Puna area of the Island of Hawaii. After an EPA inspection, the facility has now complied with the rules designed to minimize accidental chemical releases. The company has also agreed to pay a civil penalty of \$76,500.

<http://yosemite.epa.gov/opa/admpress.nsf/2dd7f669225439b78525735900400c31/89a680a618f1273c85257f380066a04a!OpenDocument>

PRESS:

Hawaii Public Radio – Dean Higuchi provided reporter Nick Yee a sound bite/quote for a story he is doing on our PGV CAFO. CLOSED, Dean Higuchi

KITV – Reporter Catherine Cruz called about whether EPA has any involvement with a parcel of land to be used by the Society for the Prevention of Cruelty to Animals (SPCA) for an animal shelter. Let her know we don't and the US COE is the ones to contact. CLOSED, Dean Higuchi

Honolulu Civil Beat – Provided reporter Anita Hofschneider to address her follow up questions on our comments to the CNMI/Guam buildup EIS and also contacts to the US COE and CNMI Bureau of Environment and Coastal Quality provided by our PIO staff to address her questions on the work going on to deal with unexploded ordinance. CLOSED, Dean Higuchi.

Honolulu Advertiser – Reporter Sophie Cocke had questions on whether EPA is reviewing the disbursements by Hawaii Dept. of Health as detailed in HDOH's news release about making their DWSRF Target as per our CAP. Let her know that we are reviewing to make sure all is complete and if everything checks out, DOH can apply for the withheld DWSRF funds. CLOSED, Dean Higuchi

WEB

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State of the Union Address - At the request of headquarters, posted to our [Twitter](#) and [Facebook](#) pages about tonight's speech and linked to a live Facebook [video of Administrator McCarthy talking with Mark Davis](#), who works to help low-income residents of Washington, DC get solar energy. Mr. Davis will be a guest of Mrs. Obama at the State of the Union Address tonight.

Web Updates:

Tribal RTOC - Updated the Tribal RTOC and Retreat Agendas on the [Tribal RTOC website](#).

NEPA - Updated the [NEPA Special Topics page](#).

CONGRESSIONAL & INTERGOVERNMENTAL

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Rep. Crescent Hardy (R-NV-4): Brent Maier coordinated and participated in a call regarding our proposed listing of the Anaconda Copper Mine Site to the NPL with Congressional staff from Congressman Crescent Hardy's DC and District Office. Superfund Division participants in this call included Enrique Manzanilla, Angeles Herrera, Harold Ball, Eugenia Chow, David Seter, and Sarah Cafasso. Participants from the Congressman's office included: Kyle Lykins, Senior Legislative Assistant; Sara Waggoner, Field Representative; and Kent Alexander, Field Representative, North Las Vegas.

Rep. Ted Lieu (D-CA-33): Brent Maier received an invite to send a representative to a press conference with Congressman Ted Lieu and U.S. Chemical Safety Board Chair Vanessa Sutherland regarding the ongoing investigation into safety violations at ExxonMobil's Torrance Refinery. Brent shared the invite with Superfund's Kay Lawrence and Dan Meer and Enforcement Division's Kathleen Johnson and Amy Miller. Brent sent a note back to the Congressional staffer thanking them for the invite, but letting them know that on such short notice, EPA is not able to send a representative to the press conference. Link to Media Advisory: <https://lieu.house.gov/media-center/press-releases/tomorrow-press-conference-rep-ted-lieu-us-chemical-safety-board-chair>

House Energy and Commerce Committee: Three Democrats on the House Energy and Commerce Committee, Frank Pallone Jr., Ranking Member; Dianna Degette, Ranking Member of the Subcommittee on Oversight Investigations; and Bobby Rush, Ranking Member of the Subcommittee on Energy and Power sent a letter to EPA Administrator Gina McCarthy and DOT Secretary Anthony Fox requesting a briefing on the Aliso Canyon natural gas storage issue. This request is being handled by OCIR in HQ. The letter requested that the briefing be conducted by January 13, 2015. OCIR's Carolyn Levine coordinated a call today and RA Blumenfeld participated and provided an update, along with PHMSA, on EPA's role and responsibilities this afternoon. No additional follow up needed at this time.

Sen. Martin Heinrich (D-NM): A final draft response to the incoming letter from Sen. Martin Heinrich regarding uranium cleanup operations at Northeast Churchrock Mine, Quivira/Kerr-McGee Mine, and the UNC Church Rock Mill is being finalized for concurrence chain for RA signature. Brent Maier extended the due date of this letter until Thursday, January 15, 2016 to provide time for final review and signature.

Rep. Brad Sherman (D-CA-30): A final draft EPA response to the incoming letter from Congressman Sherman on Aliso Canyon has been drafted by ORC and shared with PHMSA. This will be a joint response with PHMSA and FERC once a draft is ready to send to OCIR's Carolyn Levine for their assistance and coordination of working with PHMSA and FERC to finalize a draft that will be signed by EPA Administrator Gina McCarthy along with PHMSA, and FERC.

Office of Los Angeles Mayor Eric Garcetti: George Kivork, Federal Liaison with Mayor Garcetti reached out to OCIR's Mark Rupp would like to touch base with EPA regarding impacts as a result of the gas leak issue in Los Angeles by the private company, Southern California Gas, and is interested in knowing about the natural resource damage assessment, implications for small releases of oil, and impact on wildlife. Regional Counsel Sylvia Quast and George Kivork had a follow up call today at 10:00am PT.

Request for Hot Issues for Upcoming U.S. Conference of Mayors Winter Meeting: OCIR's Arnita Hannon requested Hot Issues for a select group of Region IX Mayors that are members of the Environment Committee and who will be meeting in conjunction with the U.S. Conference of Mayors Winter Meeting on January 20 – 22, 2016. Arnita is requesting any Hot Issues for these Mayors be submitted to her no later than Wednesday, January 13th. The Mayors for Region IX include Greg Stanton (Phoenix, AZ), Chair, Environment Committee; Ashley Swearengen (Fresno, CA); and Carolyn Goodman (Las Vegas, NV). Brent Maier has alerted each of the Division Liaisons and requested any Hot Issues be submitted by COB Tuesday, January 12th.

U.S. Conference of Mayors (USCM) 84th Winter Meeting: The US Conference of Mayors will convene its 84th Winter Meeting in Washington, DC January 20 – 22, 2016. Mayor Stephanie Rawlings-Blake (Baltimore, MD) serves as USCM President. Mayor Mick Cornett (Oklahoma City, OK) is Vice President, and Mayor Mitch Landrieu (New Orleans, LA) is Second Vice President. Environment Committee Chair Mayor Greg Stanton (Phoenix, AZ) has invited Administrator McCarthy to address the committee meeting when it convenes on Thursday, January 21st. The Administrator will address the committee and engage in dialogue as well. Janet McCabe, Acting Assistant Administrator for Air, is also confirmed. The committee is interested in learning more about the Clean Power Plan and the role cities can and should play in the State Implementation Plans. EPA's Office of Intergovernmental Relations (OIR) will continue to work with USCM staff on EPA's participation in the winter meeting, including any additional requests for presenters and private meetings. OCIR contact: Arnita Hannon Christmon

Senator Brian Schatz – Staffer Arun Revana called with background questions on our PGV action. Provided him with the CAFO for more background. CLOSED, Dean Higuchi

Legislative Action:

WOTUS: The House is likely to vote on a resolution to overturn the Environmental Protection Agency's waters of the United States rule, also known as the Clean Water Rule. The resolution works under the Congressional Review Act. The Senate passed the resolution in November, but President Obama has pledged to veto it.

Proboszcz, Angie

From: Zito, Kelly
Sent: Friday, January 08, 2016 4:50 PM
To: Keener, Bill;Glenn, William;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 8, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

Have a great weekend!

MEDIA

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Time Magazine: Reporter Katie Reilly had questions about the leak rate and cumulative release at the SoCalGas Aliso Canyon facility and the use of EPA's online tool to calculate equivalencies. Outlined steps for calculations. (v) CLOSED. Contact: Kelly Zito

Reuters: Reporter Alex Dobuzinskis was trying to find out if the SoCalGas leak at Aliso Canyon is the largest natural gas release in U.S. history. Referred him to HQ. (v) CLOSED. Contact: Kelly Zito

Takepart.com: Reporter David Kirby was trying to find out if the SoCalGas leak at Aliso Canyon was impacting wildlife and ecosystems. Referred him to CARB/SCAQMD who are leading air monitoring effort. (v) CLOSED. Contact: Kelly Zito

Inside EPA: Reporter Curt Barry had questions about whether the NSPS for oil and gas facilities would apply to sites like the SoCalGas Aliso Canyon natural gas storage field. Worked with HQ to clarify that NSPS applies to new, modified and reconstructed well sites located in the natural gas production segment and to compressor stations. OPEN. (v) Contact: Kelly Zito

5280 Magazine: Coordinating with HQ on responses and possible interview with a writer who is working on a piece about the Navajo Nation and the response to the Gold King Mine spill. (v) OPEN. Contact: Kelly Zito/Margot Perez-Sullivan

The Santa Barbara Independent: Reporter Léna Garcia wants to know if EPA's assessment saying that Imidacloprid is a threat to honey bees will lead to any regulatory changes. Checking with HQ. OPEN. LND. (v.) Soledad Calvino.

WEB

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Social Media:

Climate Change – Shared a post to our [Twitter](#) and [Facebook](#) pages about our plans for 2016 and linked to the Washington Post article, [EPA chief: Obama administration will seek to lock in climate gains in 2016](#).

CONGRESSIONAL & INTERGOVERNMENTAL

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Congressman Steve Knight (R-CA-25): EPA Region 9 senior managers discussed with Congressman Knight EPA's limited role with respect to the SoCal Gas natural gas leak at Aliso Canyon. Also sent follow-up information to staffer Brandon Eden on engineering firms at the site. CLOSED. Kelly Zito/Brent Maier

Proboszcz, Angie

From: Keener, Bill
Sent: Thursday, January 07, 2016 4:58 PM
To: Glenn, William;Zito, Kelly;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 7, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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New York Times: Graphics Editor Rebecca Kai is seeking data on leak rates and cumulative totals for the Southern California Gas leak at the Aliso Canyon facility. Sent her contact info for CARB and SCAQMD and link to the Cal OES website, which is clearinghouse for state information on the incident. CLOSED. (v) Contact: Kelly Zito

The Guardian: Reporter Suzanne Goldenberg is seeking information about the Southern California Gas leak at the Aliso Canyon facility, including background on any interplay between methane and ozone and data about ozone attainment areas across the state. Working with Air Div. and HQ on developing responses. Also sent her information on state agencies/contacts. AIR. OPEN. (v) Contact: Kelly Zito

Sierra Magazine: Fact checker Katherine Schuknecht verifying SCR use in Arizona, coordinated with Air division, referred her to plants in AZ as agency is technology neutral: CLOSED (v) Air

Los Angeles News Group: Reporter Stephanie Baer requested data reports on all lakes in California that were tested for cyanotoxins in 2015, as well as background information on the "2015 Cyanotoxins for California Lakes Waters" project. Reporter also requested a tour of the Region 9 lab, to find out more about how samples are tested. WATER. OPEN. (v) Contact: Michele Huitric

Reuters: Correspondent Sarah McBride had follow up questions and needed assistance with our TRI Explorer. Sent her HQ contact to help walk her through the database. CLOSED. ENF. (v.) Soledad Calvino.

KCSN News Radio: Reporter Diana Jimenez interviewed Karen Jurist and Rich Hiatt regarding the Cooper Drum settlement. CLOSED. (V) Superfund. Rusty Harris-Bishop

WEB

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Social Media:

Climate Change – Posted to our [Facebook](#) page a [video of Gina McCarthy at the Council on Foreign Relations](#), discussing the Paris Climate Change conference.

Web Updates:

Aliso Canyon – Posted a page in our Media Center with a brief statement on the [SoCalGas natural gas leak at Aliso Canyon](#) and links to CA OES’s website and EPA correspondence on the matter.

CONGRESSIONAL & INTERGOVERNMENTAL

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Congressman Steve Knight (R-CA-25). Staffer Brandon Eden asked for a call so that EPA Region R9 can explain to the Congressman EPA’s limited role with respect to the SoCal Gas natural gas leak at Aliso Canyon. Will set up call, likely for this Friday, and Jared and Sylvia may take the call. Bill Keener

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

Current Status: SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.

SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

Regulatory Actions:

State Agencies: Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

Local Agencies: Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

Federal Actions:

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

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Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

The Honorable Brad Sherman
United States House of Representatives
1030 Longworth House Office Building
Washington, DC 20515

Dear Representative Sherman:

Thank you for your letter of December 10, 2015, to Administrator Gina McCarthy regarding the gas leak at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility in Aliso Canyon, Los Angeles County. Administrator McCarthy has asked me to respond on her behalf.

The U.S. Environmental Protection Agency shares your concern about the public health and environmental effects of the gas release and has already been investigating the incident. In addition to sending an information request under the authority of the Clean Air Act to SoCal Gas on December 18, U.S. EPA Region 9 is participating in daily operational calls with State and local regulators to stay abreast of developments in controlling the gas release and assisting local residents. Two Region 9 on-scene coordinators toured the Aliso Canyon site with the Los Angeles County Fire and Hazardous Materials Unit and representatives from Lawrence Livermore National Laboratory.

Given that the Aliso Canyon Natural Gas Storage Facility is regulated under the federal Pipeline Safety Act, U.S. EPA also contacted the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration regarding its authorities to take action. We are in contact with the California Public Utilities Commission (CPUC) and the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). DOGGR has issued two orders to SoCal Gas, requiring it to provide information on the leaking well, develop plans for expeditiously capturing the escaping gas, stopping the leak, and communicating with state and local regulators. The CPUC is also conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root cause analysis of the well blowout.

Local authorities such as the South Coast Air Quality Management District and the Los Angeles County Department of Public Health have also issued orders to SoCal Gas. The latter order requires SoCal Gas to provide temporary relocation to residents, and hundreds of households have either relocated or are in the process of relocating. SoCal Gas has established a community center in the nearby Porter Ranch community to answer questions and assist residents with temporary relocation and claims.

We are pleased that our state and local partners are taking these important steps to protect public health and safety, and we will continue to investigate and monitor the situation. We stand ready to help in any way if our assistance is requested pending the results of our investigation.

If you have further questions, please have your staff contact EPA's Congressional Liaison, Brent Maier, at (415) 947-4256, maier.brent@epa.gov, or Dan Meer, Assistant Director for Emergency Response, Preparedness and Prevention, at (415) 972-3132, meer.daniel@epa.gov.

Sincerely,

Alex. Strauss
for Jared Blumenfeld *24 Dec. 2015*

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

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[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

Congressional Interest:

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]

Proboszcz, Angie

From: Jordan, Deborah
Sent: Monday, January 04, 2016 2:41 PM
To: Lori Stewart (Stewart.Lori@epa.gov); Cyran, Carissa
Subject: FW: Aliso Canyon - [REDACTED]
Attachments: Aliso Canyon - [REDACTED]

Follow Up Flag: Follow up
Flag Status: Flagged

Sorry – I didn't realize the attachment had dropped.

From: Manzanilla, Enrique
Sent: Tuesday, December 22, 2015 2:50 PM
To: Cheatham, Reggie <cheatham.reggie@epa.gov>; Natarajan, Nitin <Natarajan.Nitin@epa.gov>; Tulis, Dana <Tulis.Dana@epa.gov>
Cc: Jordan, Deborah <Jordan.Deborah@epa.gov>; Adams, Elizabeth <Adams.Elizabeth@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>; Meer, Daniel <Meer.Daniel@epa.gov>; Moore, Letitia <Moore.Letitia@epa.gov>
Subject: Fwd: Aliso Canyon - [REDACTED]

Looping.....

Sent from my iPhone

Begin forwarded message:

From: "Blumenfeld, Jared" <BLUMENFELD.JARED@EPA.GOV>
Date: December 22, 2015 at 11:43:22 AM PST
To: "Strauss, Alexis" <Strauss.Alexis@epa.gov>, "Manzanilla, Enrique" <Manzanilla.Enrique@epa.gov>
Subject: FW: Aliso Canyon - [REDACTED]

From: Blumenfeld, Jared
Sent: Monday, December 21, 2015 5:10 PM
To: Matthew R. Fritz (fritz.matthew@epa.gov) <fritz.matthew@epa.gov>
Subject: Aliso Canyon - [REDACTED]

EPA WEEKLY ADMINISTRATOR'S REPORT
January 15, 2016 – January 24, 2016

Priorities

During the week of January 18, EPA Region 9 representatives are continuing to participate in regular operational calls with local, state and company officials to stay updated on the Aliso Canyon (California) Natural Gas Storage Facility Methane Leak. As of the week of January 11, SoCal Gas has placed 2516 citizens in temporary housing, 1081 requests are in process, 1035 newly assigned to temporary home providers, 1172 are unassigned or uncalled. 744 residents have declined relocation or checked out and returned home. In addition, the Los Angeles Unified School District's Board of Education is expediting the temporary relocation of Castlebay Lane Charter and Porter Ranch Community School. School resumed on January 11.

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1. **Identify the main components of the system.** The system consists of a **client** and a **server**. The client is responsible for sending requests to the server, and the server is responsible for processing these requests and returning responses.

2. **Define the data flow.** Data flows from the client to the server via a **network**. The server processes the data and returns the result to the client.

3. **Describe the system architecture.** The system is a **distributed system** where the client and server are located on different machines. The client and server are connected via a **network**.

4. **Explain the system's functionality.** The system is designed to provide a **remote service** to the client. The client sends a request to the server, and the server returns the result to the client.

5. **Discuss the system's performance.** The system's performance is determined by the **network latency** and the **server processing time**. The system is designed to be **scalable** and **reliable**.

6. **Summarize the system's benefits.** The system provides a **remote service** to the client, which is **scalable** and **reliable**. The system is designed to be **easy to use** and **flexible**.

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EPA WEEKLY ADMINISTRATOR'S REPORT
January 8, 2016 – January 17, 2016

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Via email (DArriola@semprautilities.com) and Certified Mail

CERTIFIED MAIL NO. 7015 0640 0007 0638 0669
RETURN RECEIPT REQUESTED

In Reply Refer to:
Southern California Gas Company Aliso Canyon Natural
Gas Release

Dennis Arriola
President and CEO
Southern California Gas Company
555 W 5th St
Los Angeles, CA 90013-1010

RE: Request for Information, Southern California Gas Company Aliso Canyon Natural Gas
Release

Dear Mr. Arriola:

The United States Environmental Protection Agency ("EPA") is conducting an investigation of the natural gas release (the "Release") at the Southern California Gas Company (the "Company's") Aliso Canyon Natural Gas Storage Facility located at 12801 Tampa Ave. in Northridge, CA, (the "Facility") that was discovered on or about October 23, 2015.

With this letter and its enclosure ("Information Request"), EPA seeks additional information and documents concerning the Company's compliance with the Clean Air Act, 42 U.S.C. §§ 7401 *et seq* ("CAA"). This Information Request is authorized pursuant to Section 114 of the CAA, 42 U.S.C. § 9614. Your responses to this letter must be made by a letter, signed by a person or persons duly authorized to represent the Company. Electronic copies of submittals are preferred. EPA believes that much of the requested information is, or should be, readily available at the Facility. If there are any responsive documents or information which you are unable to provide, please provide an explanation for, and documentation of reasons for, the Company's inability to provide that information. Please send your submittals so that they are received by no later than **December 31, 2015**. Address your response to:

Kathryn Lawrence (SFD-9-3)
Section Chief
Emergency Prevention and Preparedness Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
lawrence.kathryn@epa.gov

Please note that, pursuant to regulations located at 40 CFR Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information as defined in 40 CFR § 2.201(c). Asserting a business confidentiality claim does not relieve you from the obligation to fully respond to this letter. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. In addition, EPA has not waived any rights to take enforcement action for past or future violations.

The Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action being taken in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and administrative penalties of up to \$37,500 per day of noncompliance. In addition, the submission of knowingly false or misleading statements may be punished by a fine pursuant to Title 18 of the U.S. Code, or by imprisonment for not more than two years, or both.

This request for information is not subject to review by the Office of Management and Budget ("OMB" under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. §§ 3502(3), 3507, and 3512. *See, also*, 4 CFR §§ 1320.3(c), 1320.5, and 1320.6(a). Furthermore, this request is exempt from OMB review under the Paperwork Reduction Act because it is part of an investigation of a specific individual or entity. 44 U.S.C. § 3518(c)(1); 5 CFR § 1320.4.

If you have questions about the legal aspects of this Information Request, please contact Ms. Letitia Moore, U.S. EPA Assistant Regional Counsel, at (415) 972-3928 or moore.letitia@epa.gov. The Region IX technical contact for this information request is Kathryn Lawrence, who may be reached at (415) 972-3039 or johnstone.jeremy@epa.gov. We thank you in advance for your cooperation.

Sincerely,



Enrique Manzanilla, Director
Superfund Division

Enclosures (2)

1 - Information Request

2 - Confidential Business Information

cc (via email w/enclosures):

Jimmie Cho, SoCalGas

John Geroch, DOGGR

Mohsen Nazemi, SCAQMD

Alice Reynolds, CalEPA

Bill Jones, LACFD

Gregory Reynar, LAFD



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 1

Information Request
Southern California Gas Co.

Please provide the information requested in the Information Request section of this Enclosure such that it is received by no later than **December 31, 2015**.

INSTRUCTIONS

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form
3. All responsive documents must be: a) provided as an accurate and legible copy in a searchable PDF file format; b) submitted on via electronic media (thumb drive, CD, or DVD); and c) number stamped in sequential order (e.g. BATES stamped). Furthermore, data should be provided in spreadsheet format (e.g., Excel format), when available, rather than as image or PDF formats.
4. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
5. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice. [Some EPA Regions refer to an enclosure such as the one I've included as "Enclosure 4" here for further discussion of the CBI issue and process].
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.

7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding the information.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean the Southern California Gas Co., or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by the Company at the Aliso Canyon Natural Gas Storage Facility property or properties located at 12801 Tampa Ave. in Northridge, CA, or contiguous or adjacent to that address.

3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.

5. "Release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, extremely hazardous substances, regulated substances, air pollutant, pollutants or contaminants. "Release" shall include "accidental release" as that term is defined by 40 C.F.R. § 68.3.

7. "Standard Operating Procedure" or "SOP" means any express method or series of protocols to be followed routinely for the performance of designated operations or in designated situations by you or your subcontractors.

8. "Well SS 25 Release" shall mean the Release of odorized natural gas from Facility Standard Sesnon Well SS 25 that commenced on or about October 23, 2015.

9. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, 40 CFR Part 302, 40 CFR Part 355 or 40 CFR Part 372, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

1. Provide the following general information:
 - a. A Facility map and plot plan, to include the well pad for Standard Sesnon Well 25 ("Well SS 25");
 - b. A description of the Facility and operations;
 - c. A management organizational chart for the Facility (include identification of personnel with environmental responsibilities); and
 - d. Descriptive information about any/all other natural gas storage fields owned or operated by the Company and/or its parent corporation.
2. With respect to the Well SS 25 Release provide copies of all submittals made to any local, state or federal agencies relating to the Release as of the date of the response to this Information Request.
3. Unless otherwise provided in response to Item 2 above, provide the following regarding the Well SS 25 Release. If provided in in response to Item 2 above, identify the corresponding document and page numbers.
 - a. A map or other depiction showing, as well as a description of, the point(s) of the Release;
 - b. A description of the cause of the Release, including all known and/or suspected root causes and contributory factors;
 - c. Design specifications for Well SS 25;
 - d. A detailed history of physical changes or modifications made to Well SS 25, including the dates such modifications were implemented and the purpose for which the modifications were made;
 - e. A description of the Company's mechanical integrity program for the inspection, testing and preventive maintenance for Well SS 25, including leak detection;
 - f. All documents that describe Standard Operating Procedures used in the inspection, testing and preventive maintenance of Well SS 25, including leak detection;
 - g. A listing of recognized and generally accepted good engineering practices, used in the development and implementation of the Company's inspection, testing and preventive maintenance of Well SS 25;
 - h. Inspection, maintenance, and leak detection records for Well SS 25 from January 1, 2012 to the present;

- i. All documents that describe Standard Operating Procedures used for accident mitigation or emergency response regarding any risks associated with the maintenance and operation of Well SS 25 or other similarly-situated wells;
- j. A description of current fire safety/prevention measures being implemented both at the Release point(s) and at the Well SS 25 wellhead;
- k. A description of current Incident Command Structure (ICS) organizational structure (ICS 207 or equivalent);
- l. Identification of any/all incident-specific website(s) that any safety and/or regulatory agencies have current access to. Provide access to EPA;
- m. Identify and provide copies of any notifications of the Release made to public agencies, including agency name; date, time and method of notification; whom contacted; and notification/report number (as applicable);
- n. Copies of the Company's policies and procedures with respect to public agency notifications of natural gas leaks at the Facility;
- o. Company-prepared estimates of release rates to the atmosphere (daily, weekly, monthly, and/or yearly) for natural gas, total volatile organic compounds (VOCs) (as defined under 40 CFR § 51.100) and total reduced sulfur (TRS) from Well SS 25 during the Well SS 25 Release, with supporting documentation of methodology/methodologies employed in arriving at estimate(s); and
- p. A description of all activities undertaken, as of the date of your response to this Information Request, to mitigate the rate and quantity of natural gas released during the Well SS 25 Release.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Enclosure 2

**Confidential Business Information (CBI)
Assertion and Substantiation Requirements**

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business’s competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R.

§ 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R.

§ 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Letitia Moore
Assistant Regional Counsel
U.S. EPA Region 9
75 Hawthorne St.
San Francisco, CA 94105
Moore.letitia@epa.gov

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.

EPA WEEKLY ADMINISTRATOR'S REPORT
January 8, 2016 – January 17, 2016

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From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 12:35 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Hi Nahal,

Happy new year too. Thanks for this update.

Can you provide the files and documents the gas company has submitted in response to EPA's Dec. 18 information request? I'd rather not have to FOIA it if possible, but please let me know.

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 12:25 PM
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I can keep you posted as we have more information to share.

Hope all is well. Best,

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Thanks and best regards

Tony Barboza

Staff Writer
Los Angeles Times
Office: 213-237-6612
Cell: 213-219-0047
tony.barboza@latimes.com

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Tony Barboza

Staff Writer

Los Angeles Times

Office: 213-237-6612

Cell: 213-219-0047

tony.barboza@latimes.com

Proboszcz, Angie

From: Zito, Kelly
Sent: Tuesday, January 12, 2016 5:08 PM
To: Keener, Bill;Glenn, William;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 12, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

MEDIA

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Politico: Reporter Elana Schor was looking for an update on EPA's involvement in the natural gas leak at Southern California Gas Company's Aliso Canyon facility. Sent statement explaining state's lead on response and EPA's ongoing review of SoCalGas documents submitted. CLOSED. (v). Contact: Kelly Zito

Reuters: Reporter Alex Dobuzinskis was looking for an update on EPA's involvement in the natural gas leak at Southern California Gas Company's Aliso Canyon facility. Sent statement explaining state's lead on response and EPA's ongoing review of SoCalGas documents submitted. CLOSED. (v). Contact: Kelly Zito

Santa Maria Sun: Reporter Brenda Swanston was looking to speak with someone about imidacloprids and under what circumstances they have a negative effect On the bee population and potential action the EPA might take in response to its assessment. Referred to HQ. OPEN. (V). Nahal Mogharabi/Cathy Milbourn.

Bloomberg: Reporter Mark Chediak was looking to see if EPA regulates the well responsible for the leak at Porter Ranch. Referred him to DOGGR and PHMSA. Also sent him copies of the Sherman letter and our 114 information request. SFUND. CLOSED. (V). Nahal Mogharabi.

PRESS RELEASE issued:

Puna Geothermal Venture CAFO – Press release was issued today on our settlement with PGV over Clean Air Act chemical safety violations at its geothermal energy plant in the Puna area of the Island of Hawaii. After an EPA inspection, the facility has now complied with the rules designed to minimize accidental chemical releases. The company has also agreed to pay a civil penalty of \$76,500.
<http://yosemite.epa.gov/opa/admpress.nsf/2dd7f669225439b78525735900400c31/89a680a618f1273c85257f380066a04a!OpenDocument>

PRESS:

Hawaii Public Radio – Dean Higuchi provided reporter Nick Yee a sound bite/quote for a story he is doing on our PGV CAFO. CLOSED, Dean Higuchi

KITV – Reporter Catherine Cruz called about whether EPA has any involvement with a parcel of land to be used by the Society for the Prevention of Cruelty to Animals (SPCA) for an animal shelter. Let her know we don't and the US COE is the ones to contact. CLOSED, Dean Higuchi

Honolulu Civil Beat – Provided reporter Anita Hofschneider to address her follow up questions on our comments to the CNMI/Guam buildup EIS and also contacts to the US COE and CNMI Bureau of Environment and Coastal Quality provided by our PIO staff to address her questions on the work going on to deal with unexploded ordinance. CLOSED, Dean Higuchi.

Honolulu Advertiser – Reporter Sophie Cocke had questions on whether EPA is reviewing the disbursements by Hawaii Dept. of Health as detailed in HDOH's news release about making their DWSRF Target as per our CAP. Let her know that we are reviewing to make sure all is complete and if everything checks out, DOH can apply for the withheld DWSRF funds. CLOSED, Dean Higuchi

WEB

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State of the Union Address - At the request of headquarters, posted to our [Twitter](#) and [Facebook](#) pages about tonight's speech and linked to a live Facebook [video of Administrator McCarthy talking with Mark Davis](#), who works to help low-income residents of Washington, DC get solar energy. Mr. Davis will be a guest of Mrs. Obama at the State of the Union Address tonight.

Web Updates:

Tribal RTOC - Updated the Tribal RTOC and Retreat Agendas on the [Tribal RTOC website](#).

NEPA - Updated the [NEPA Special Topics page](#).

CONGRESSIONAL & INTERGOVERNMENTAL

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Rep. Crescent Hardy (R-NV-4): Brent Maier coordinated and participated in a call regarding our proposed listing of the Anaconda Copper Mine Site to the NPL with Congressional staff from Congressman Crescent Hardy's DC and District Office. Superfund Division participants in this call included Enrique Manzanilla, Angeles Herrera, Harold Ball, Eugenia Chow, David Seter, and Sarah Cafasso. Participants from the Congressman's office included: Kyle Lykins, Senior Legislative Assistant; Sara Waggoner, Field Representative; and Kent Alexander, Field Representative, North Las Vegas.

Rep. Ted Lieu (D-CA-33): Brent Maier received an invite to send a representative to a press conference with Congressman Ted Lieu and U.S. Chemical Safety Board Chair Vanessa Sutherland regarding the ongoing investigation into safety violations at ExxonMobil's Torrance Refinery. Brent shared the invite with Superfund's Kay Lawrence and Dan Meer and Enforcement Division's Kathleen Johnson and Amy Miller. Brent sent a note back to the Congressional staffer thanking them for the invite, but letting them know that on such short notice, EPA is not able to send a representative to the press conference. Link to Media Advisory: <https://lieu.house.gov/media-center/press-releases/tomorrow-press-conference-rep-ted-lieu-us-chemical-safety-board-chair>

House Energy and Commerce Committee: Three Democrats on the House Energy and Commerce Committee, Frank Pallone Jr., Ranking Member; Dianna Degette, Ranking Member of the Subcommittee on Oversight Investigations; and Bobby Rush, Ranking Member of the Subcommittee on Energy and Power sent a letter to EPA Administrator Gina McCarthy and DOT Secretary Anthony Fox requesting a briefing on the Aliso Canyon natural gas storage issue. This request is being handled by OCIR in HQ. The letter requested that the briefing be conducted by January 13, 2015. OCIR's Carolyn Levine coordinated a call today and RA Blumenfeld participated and provided an update, along with PHMSA, on EPA's role and responsibilities this afternoon. No additional follow up needed at this time.

Sen. Martin Heinrich (D-NM): A final draft response to the incoming letter from Sen. Martin Heinrich regarding uranium cleanup operations at Northeast Churchrock Mine, Quivira/Kerr-McGee Mine, and the UNC Church Rock Mill is being finalized for concurrence chain for RA signature. Brent Maier extended the due date of this letter until Thursday, January 15, 2016 to provide time for final review and signature.

Rep. Brad Sherman (D-CA-30): A final draft EPA response to the incoming letter from Congressman Sherman on Aliso Canyon has been drafted by ORC and shared with PHMSA. This will be a joint response with PHMSA and FERC once a draft is ready to send to OCIR's Carolyn Levine for their assistance and coordination of working with PHMSA and FERC to finalize a draft that will be signed by EPA Administrator Gina McCarthy along with PHMSA, and FERC.

Office of Los Angeles Mayor Eric Garcetti: George Kivork, Federal Liaison with Mayor Garcetti reached out to OCIR's Mark Rupp would like to touch base with EPA regarding impacts as a result of the gas leak issue in Los Angeles by the private company, Southern California Gas, and is interested in knowing about the natural resource damage assessment, implications for small releases of oil, and impact on wildlife. Regional Counsel Sylvia Quast and George Kivork had a follow up call today at 10:00am PT.

Request for Hot Issues for Upcoming U.S. Conference of Mayors Winter Meeting: OCIR's Arnita Hannon requested Hot Issues for a select group of Region IX Mayors that are members of the Environment Committee and who will be meeting in conjunction with the U.S. Conference of Mayors Winter Meeting on January 20 – 22, 2016. Arnita is requesting any Hot Issues for these Mayors be submitted to her no later than Wednesday, January 13th. The Mayors for Region IX include Greg Stanton (Phoenix, AZ), Chair, Environment Committee; Ashley Swearengin (Fresno, CA); and Carolyn Goodman (Las Vegas, NV). Brent Maier has alerted each of the Division Liaisons and requested any Hot Issues be submitted by COB Tuesday, January 12th.

U.S. Conference of Mayors (USCM) 84th Winter Meeting: The US Conference of Mayors will convene its 84th Winter Meeting in Washington, DC January 20 – 22, 2016. Mayor Stephanie Rawlings-Blake (Baltimore, MD) serves as USCM President. Mayor Mick Cornett (Oklahoma City, OK) is Vice President, and Mayor Mitch Landrieu (New Orleans, LA) is Second Vice President. Environment Committee Chair Mayor Greg Stanton (Phoenix, AZ) has invited Administrator McCarthy to address the committee meeting when it convenes on Thursday, January 21st. The Administrator will address the committee and engage in dialogue as well. Janet McCabe, Acting Assistant Administrator for Air, is also confirmed. The committee is interested in learning more about the Clean Power Plan and the role cities can and should play in the State Implementation Plans. EPA's Office of Intergovernmental Relations (OIR) will continue to work with USCM staff on EPA's participation in the winter meeting, including any additional requests for presenters and private meetings. OCIR contact: Arnita Hannon Christmon

Senator Brian Schatz – Staffer Arun Revana called with background questions on our PGV action. Provided him with the CAFO for more background. CLOSED, Dean Higuchi

Legislative Action:

WOTUS: The House is likely to vote on a resolution to overturn the Environmental Protection Agency's waters of the United States rule, also known as the Clean Water Rule. The resolution works under the Congressional Review Act. The Senate passed the resolution in November, but President Obama has pledged to veto it.

Proboszcz, Angie

From: Zito, Kelly
Sent: Friday, January 08, 2016 4:50 PM
To: Keener, Bill;Glenn, William;Gaudario, Abigail;R9 Supervisors
Cc: Barkett, Bonnie;Maier, Brent;Calvino, Maria Soledad;Higuchi, Dean;Reyes, Deldi;PerezSullivan, Margot;Mogharabi, Nahal;Nazmi, Niloufar;Harris-Bishop, Rusty;Hudnall, Patricia;Ford, Margaret;Henderson, Alita;COHEN, Deborra;Pratt, Kristen;Meltzer, Kathy;Engelman, Alexa;Hood, Timonie;Blazej, Nova;Stollman, Scott;Amato, Paul;Schmidt, David;Skadowski, Suzanne;Rao, Kate;Ty, Fatima;Kao, Jessica;Huitric, Michele;Karlson, Kristine
Subject: End of Day -- January 8, 2016

Follow Up Flag: Follow up
Flag Status: Flagged

Have a great weekend!

MEDIA

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Time Magazine: Reporter Katie Reilly had questions about the leak rate and cumulative release at the SoCalGas Aliso Canyon facility and the use of EPA's online tool to calculate equivalencies. Outlined steps for calculations. (v) CLOSED. Contact: Kelly Zito

Reuters: Reporter Alex Dobuzinskis was trying to find out if the SoCalGas leak at Aliso Canyon is the largest natural gas release in U.S. history. Referred him to HQ. (v) CLOSED. Contact: Kelly Zito

Takepart.com: Reporter David Kirby was trying to find out if the SoCalGas leak at Aliso Canyon was impacting wildlife and ecosystems. Referred him to CARB/SCAQMD who are leading air monitoring effort. (v) CLOSED. Contact: Kelly Zito

Inside EPA: Reporter Curt Barry had questions about whether the NSPS for oil and gas facilities would apply to sites like the SoCalGas Aliso Canyon natural gas storage field. Worked with HQ to clarify that NSPS applies to new, modified and reconstructed well sites located in the natural gas production segment and to compressor stations. OPEN. (v) Contact: Kelly Zito

5280 Magazine: Coordinating with HQ on responses and possible interview with a writer who is working on a piece about the Navajo Nation and the response to the Gold King Mine spill. (v) OPEN. Contact: Kelly Zito/Margot Perez-Sullivan

The Santa Barbara Independent: Reporter Léna Garcia wants to know if EPA's assessment saying that Imidacloprid is a threat to honey bees will lead to any regulatory changes. Checking with HQ. OPEN. LND. (v.) Soledad Calvino.

WEB

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Social Media:

Climate Change – Shared a post to our [Twitter](#) and [Facebook](#) pages about our plans for 2016 and linked to the Washington Post article, [EPA chief: Obama administration will seek to lock in climate gains in 2016](#).

CONGRESSIONAL & INTERGOVERNMENTAL

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Congressman Steve Knight (R-CA-25): EPA Region 9 senior managers discussed with Congressman Knight EPA's limited role with respect to the SoCal Gas natural gas leak at Aliso Canyon. Also sent follow-up information to staffer Brandon Eden on engineering firms at the site. CLOSED. Kelly Zito/Brent Maier

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EPA WEEKLY ADMINISTRATOR'S REPORT
January 15, 2016 – January 24, 2016

Priorities

During the week of January 18, EPA Region 9 representatives are continuing to participate in regular operational calls with local, state and company officials to stay updated on the Aliso Canyon (California) Natural Gas Storage Facility Methane Leak. As of the week of January 11, SoCal Gas has placed 2516 citizens in temporary housing, 1081 requests are in process, 1035 newly assigned to temporary home providers, 1172 are unassigned or uncalled. 744 residents have declined relocation or checked out and returned home. In addition, the Los Angeles Unified School District's Board of Education is expediting the temporary relocation of Castlebay Lane Charter and Porter Ranch Community School. School resumed on January 11.

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1. **Identify the main components of the system.** The system consists of a **client** and a **server**. The client is responsible for sending requests to the server, and the server is responsible for processing these requests and returning responses.

2. **Define the data flow.** Data flows from the client to the server via a **network**. The server processes the data and returns the result to the client.

3. **Describe the system architecture.** The system is a **distributed system** where the client and server are located on different machines. The client uses a **web browser** to interact with the server.

4. **Explain the system's functionality.** The system allows users to **access data** stored on the server. Users can **search** for specific data and **retrieve** it. The server also provides **authentication** services to ensure that only authorized users can access the data.

5. **Discuss the system's security.** The system uses **encryption** to protect data in transit. It also implements **access control** to prevent unauthorized access to the data.

6. **Outline the system's performance.** The system is designed to be **scalable** and **efficient**. It can handle a large number of concurrent users and process requests quickly.

7. **Summarize the system's benefits.** The system provides a **secure** and **reliable** way to access data. It is easy to use and can be integrated with other systems.

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From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]
Sent: Thursday, January 14, 2016 12:35 PM
To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>
Subject: RE: Aliso Canyon

Hi Nahal,

Happy new year too. Thanks for this update.

Can you provide the files and documents the gas company has submitted in response to EPA's Dec. 18 information request? I'd rather not have to FOIA it if possible, but please let me know.

Thanks,

Tony

From: Mogharabi, Nahal [<mailto:MOGHARABI.NAHAL@EPA.GOV>]
Sent: Thursday, January 14, 2016 12:25 PM
To: Barboza, Tony
Subject: RE: Aliso Canyon

Hi Tony,

Happy New Year! Thanks for checking in. Regarding EPA's involvement, below is the latest.

U.S. EPA is participating in daily operational calls with these local and state regulators and Southern California Gas Company to stay abreast of developments in controlling the gas release and assisting local residents. On Dec. 18, U.S. EPA Region 9 sent a federal Clean Air Act information request letter to Southern California Gas Company (attached) for additional data and documents related to the facility and its operation. EPA is currently reviewing the information submitted and expects to receive additional information from the company in coming days. After completing its review of this information and in consultation with the state and local regulators already active on the scene, EPA will determine the appropriate next steps.

As you know, California state and local agencies are on the forefront of the response to the Aliso Canyon natural gas leak. They include the California Office of Emergency Services (Cal OES), California Division of Oil, Gas and Geothermal Resources (DOGGR), the South Coast Air Quality Management District, the County of Los Angeles Fire and Public Health

Departments, the City of Los Angeles, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), California Energy Commission (CEC), Division of Occupational Safety and Health (Cal/OSHA), and the Office of Environmental Health Hazard Assessment (OEHHA). Please see the California Office of Emergency Services website for the latest information: (<http://www.caloes.ca.gov/ICESite/Pages/Aliso-Canyon.aspx>).

I can keep you posted as we have more information to share.

Hope all is well. Best,

Nahal

From: Barboza, Tony [<mailto:Tony.Barboza@latimes.com>]

Sent: Thursday, January 14, 2016 9:36 AM

To: Mogharabi, Nahal <MOGHARABI.NAHAL@EPA.GOV>

Subject: Aliso Canyon

Hi Nahal,

Would you have a moment to discuss U.S. EPA's role in the response to the Aliso Canyon gas leak? I haven't heard much and would just like to understand the scope of the agency's involvement.

Thanks and best regards

Tony Barboza

Staff Writer

Los Angeles Times

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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MEMORANDUM

MAP. - 6 2006

OFFICE OF
GENERAL COUNSEL

TO: Granta Nakayama
Assistant Administrator
Office of Enforcement and Compliance Assistance

Susan Bodine
Assistant Administrator
Office of Solid Waste and Emergency Response

Regional Administrators, Regs. I-X

Regional Counsel, Regs. I-X

FROM: Ann R. Klee 
General Counsel

SUBJECT: Applicability of Clean Air Act Section 112(r)(1) General Duty Clause and Section 112(r)(7) Risk Management Program to Liquefied Natural Gas Facilities

A number of EPA regions are involved in the review and licensing of proposed on- and off-shore liquefied natural gas (LNG) distribution facilities. The Office of General Counsel (OGC) has been working with regional and headquarter offices to coordinate the Agency's response to legal issues raised by these facilities. An issue that has arisen is the applicability of the "general duty clause" of Clean Air Act (CAA) section 112(r)(1) and the Risk Management Program (RMP) regulations under CAA section 112(r)(7). The purpose of this memorandum is to clarify that the language of the statute and the legislative history demonstrate that Congress did not intend the general duty clause and the RMP regulations to apply to LNG facilities to the extent they transport, or store incident to transportation, extremely hazardous substances, including methane.¹ This memorandum supercedes all previous memoranda and opinions on this topic.

¹ LNG facilities at which "extremely hazardous substances" are present for reasons other than transportation or storage incident to transportation are subject to the general duty clause with respect to those substances. LNG facilities at which substances listed under CAA section 112(r)(3) are present in more than threshold quantities for reasons other than transportation or storage incident to transportation are subject to the RMP regulations with respect to those substances. Thus, for example, a LNG facility that stores ammonia for use at the terminal above the applicable threshold would be subject to the general duty clause and the RMP for the ammonia it stores.

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Statutory Background

CAA section 112(r) establishes a two-tier system for preventing accidental releases of “extremely hazardous substances” from “stationary sources.” The section 112(r)(1) general duty clause requires stationary sources storing or using any extremely hazardous substance to identify hazards associated with such substance and design and maintain a safe facility. RMP regulations under section 112(r)(7) require stationary sources having more than a “threshold quantity” of a “regulated substance” to develop and implement “risk management programs” and submit “risk management plans” describing those programs. “Regulated substances” are the chemicals identified by EPA under section 112(r)(3) as posing the greatest risk to public health and the environment in the event of an accidental release.

Both section 112(r)(1) and section 112(r)(7) apply to “stationary sources.” Section 112(r)(2)(C) defines “stationary source” for the purpose of section 112(r) as “any buildings, structures, equipment, installations or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur.” This definition is similar but not identical to other CAA definitions of “stationary source.”

The legislative history of section 112(r) indicates that Congress did not intend the term “stationary source” to include transportation facilities (*e.g.*, LNG facilities) for purposes of either section 112(r)(1) or section 112(r)(7). Members of the Conference Committee for the Clean Air Act Amendments of 1990, which added section 112(r), stated that “[t]he conferees do not intend the term ‘stationary source’ to apply to *transportation, including the storage incident to such transportation*, of any regulated substance or other extremely hazardous substance under the provisions of this subsection,” referring to section 112(r). Joint Explanatory Statement of the Committee of the Conference at 340 (emphasis added).²

Section 112(r) provides both discretionary and mandatory regulatory authority. Under section 112(r)(7)(A), the Agency “is authorized” to issue “release prevention, detection, and correction requirements” that “may make distinctions between various types, classes, and kinds of facilities.” Section 112(r)(7)(B)(i), by contrast, requires EPA to issue regulations “to provide,

² This conference statement is particularly enlightening given the scope of the Senate’s original version of 112(r), which sought to apply 112(r) to the “broadest set of activities . . . including, but not limited to, *transportation . . . activities*” (emphasis added). The conference made it clear that it was adopting a position contrary to the Senate’s original version.

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to the greatest extent practicable, for the prevention and detection of accidental releases of regulated substances and for response to such releases. . . .” It further stipulates that “[t]he regulations shall cover storage.” The regulations must meet other criteria set forth in section 112(r)(7)(B)(ii), which provides, among other things, that the “regulations . . . shall require the owner or operator of stationary sources at which a regulated substance is present in more than a threshold quantity to prepare and implement a risk management plan to detect and prevent or minimize accidental releases of such substances from the stationary source”

Regulatory History

In 1994, EPA issued a rule under section 112(r)(3) listing toxic and flammable chemicals as “regulated substances” for purposes of the regulations EPA was required to issue under section 112(r)(7)(B). As part of that rulemaking, EPA promulgated a definition of “stationary source” that excluded “transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under [specified DOT regulations regulating LNG terminals and pipelines].” 59 Fed. Reg. 4478, 4493 (January 31, 1994). EPA explained in the rule’s preamble that “[f]or purposes of regulations under section 112(r), the term stationary source does not apply to transportation conditions, which would include storage incident to such transportation, of any 112(r) regulated substance. Pipelines, transfer stations, and other activities already covered under DOT as transportation of hazardous substances by pipeline, or incident to such transportation [under the specified regulations] would not be covered.” *Id.* at 4490.

In 1996, EPA proposed to revise the definition to clarify that exempt transportation includes, but is not limited to, transportation activities subject to the DOT regulations specified in the promulgated definition. The Agency explained that it “intended to exclude from the definition of stationary source all transportation and storage incident to transportation to be consistent with EPCRA [the Emergency Planning and Community Right-to-Know Act].” 61 Fed. Reg. 16,598, 16,601 (April 15, 1996). The Agency viewed CAA section 112(r) as an extension of EPCRA, which excludes transportation and storage incident to transportation. *See, e.g.*, 58 Fed. Reg. 5,102 (January 19, 1993). The legislative history of section 112(r) confirms that Congress considered section 112(r) as building on EPCRA’s requirements that covered facilities inform local and state officials of extremely hazardous chemicals at the facilities and that local and state officials plan for responding to a release of those chemicals. *See, e.g.*, S. Rept. 101-228 at 250.

In 1998, EPA promulgated a revised definition of “stationary source” that remains in effect today. 63 Fed. Reg. 640, 642-43 (January 6, 1998). It clarified, among other things, that the exemption for regulated substances in transportation, or in storage incident to such

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transportation, is not limited to LNG terminals and pipelines subject to the DOT regulations cited in the definition. *Id.* at 642. One commenter on the proposed rule noted that in proposing to revise the definition to more broadly exclude transportation, including storage incident to transportation, EPA was “following the wishes of Congress,” citing the legislative history discussed above. The commenter requested that EPA provide a written confirmation of its interpretation of congressional intent. EPA responded as follows:

EPA agrees that the exclusion of transportation and storage incident to transportation from the definition of stationary source is consistent with Congressional intent. The definition of stationary source that EPA is promulgating reflects the language of the Congressional report quoted by one of the commenters.

List of Substances and Thresholds for Accidental Release Prevention; Proposed Amendments: Summary and Response to Comments (hereinafter RTC), December 1997, p. 21.

In 1996, EPA issued its RMP regulations under section 112(r)(7)(B), thereby discharging its mandatory duty to issue regulations under that provision. The RMP regulations added the substantive requirements that apply to “stationary sources,” as defined by the list rule, at which “regulated substances” are present above applicable threshold quantities. When the “stationary source” definition was revised in 1998, it clarified the scope of the RMP regulations.

Regulation of LNG Facilities

On-shore LNG facilities are subject to Department of Transportation (DOT) safety standards. *See* 49 C.F.R. part 193 (Liquefied Natural Gas Facilities: Federal Safety Standards); 33 C.F.R. part 127 (Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas). DOT’s regulations comprehensively prescribe safety, design, siting, construction, equipment, operations, maintenance, training, fire protection, and security requirements for all on-shore LNG facilities. LNG facilities must be designed and located to minimize the hazards to persons and offsite property resulting from leaks and spills of natural gas. In particular, on-shore LNG facilities must have a “thermal exclusion zone” around the facility, which is determined by conducting modeling using parameters specified by DOT (analogous to EPA’s off-site consequence analyses).

Off-shore LNG facilities are regulated by DOT’s Maritime Administration (MARAD) and the Coast Guard under the Deepwater Port Act and the Maritime Transportation Security Act of 2002 (MTSA). *See* 33 U.S.C. § 1503; 46 U.S.C. § 210; 33 C.F.R. parts 148, 149, and 150. Off-shore facilities currently are subject to “interim” regulations. These regulations contain

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standards for facility licensing, siting, construction, design, operations, inspection, personnel training and qualifications, vessel navigation and safety zones, fire protection, emergency plans and operations, and workplace safety and health. The MTSA mandates that permanent standards be adopted "as soon as practicable." The Coast Guard expects to finalize permanent standards in 2006.

Analysis

A. Clean Air Act Section 112(r)(7) RMP Regulations Do Not Apply to On- or Off-shore LNG Facilities

EPA has expressly provided that the RMP regulations do not apply to on-shore LNG facilities to the extent they transport or store incident to such transport regulated substances. In 1996, EPA defined "stationary source," the legal prerequisite for being subject to the RMP regulations, as "excluding transportation, including storage incident to transportation, provided such transportation is regulated under 49 CFR part 192, 193, or 195. . . . as well as transportation subject to natural gas or hazardous liquid programs for which a state has in effect a certification under 49 U.S.C. section 60105." 61 Fed. Reg. at 16,601. In 1998, EPA clarified that the "transportation exemption" was not limited to just sources regulated by DOT, but included transportation and storage incident to transportation generally. 63 Fed. Reg. at 642. It also reiterated that the exemption "applies to liquefied natural gas (LNG) facilities subject to [DOT] oversight or regulation . . . or a state natural gas or hazardous liquid program." *Id.* EPA made clear that it promulgated such a definition of "stationary source," *i.e.*, one that excludes transportation and storage incident to transportation, including LNG facilities, to be "consistent with Congressional intent." *See* RTC at 21. As discussed in greater detail below, EPA did not suggest that it was narrowly interpreting the statutory definition of "stationary source" for RMP regulatory purposes.

The above-cited preamble discussions addressed on-shore LNG facilities only; at the time there were no existing or proposed off-shore LNG facilities. The revised definition of "stationary source" and the accompanying preamble discussions, however, make clear that off-shore LNG facilities also qualify for the transportation exemption and thus are not subject to the RMP regulations. Consistent with Congress's express intent to exempt all transportation facilities from 112(r), EPA broadened the transportation exemption to all transportation, including storage incident to transportation. There is no doubt that off-shore LNG facilities are transportation facilities, since they are functionally equivalent to on-shore LNG facilities. Although off-shore facilities are not subject to 49 C.F.R. parts 192, 193, or 195, as discussed above, they are subject to comprehensive regulation by MARAD and the Coast Guard. *See* 33 C.F.R. parts 148, 149, and 150. Thus, there is no legal or policy reason to subject off-shore LNG facilities to the RMP

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regulations.

B. Clean Air Act 112(r)(1) General Duty Clause Does Not Apply to On- or Off-shore LNG Facilities

1. Congress unambiguously exempted transportation facilities from the definition of “stationary source”

As discussed above, Congress expressed its intent that “‘stationary source’ not apply to transportation, including the storage incident to transportation, of any *regulated substance or other extremely hazardous substance* under the *provisions*” of section 112(r) (emphasis added). The conference’s use of the phrase “provisions of section 112(r)” indicates that it intended to exempt transportation facilities from all of section 112(r), not just 112(r)(7). Had Congress intended to exempt transportation facilities only from certain subsections or subparagraphs, presumably it would have said so. Elsewhere in the CAA and its legislative history, Congress made such distinctions.

The Committee’s reference to “any regulated substance *or other extremely hazardous substance*” (emphasis added) further evidences that it was addressing section 112(r) generally, not just the section 112(r)(7)(B) RMP program. Section 112(r)(7)(B) applies only to the more limited universe of “regulated substances,” whereas other section 112(r) provisions, including section 112(r)(1), apply to both “regulated substances” and “other extremely hazardous substances.” Had Congress not intended to exempt transportation facilities from the entirety of section 112(r), or, stated differently, had it intended to exempt such facilities only from the RMP regulations, it would not have referenced “other extremely hazardous substances,” since 112(r)(7)(B) regulates only “regulated substances.”

Taken together, the Conference Committee’s references to “provisions of section 112(r)” and “extremely hazardous substances,” demonstrate unequivocally that Congress intended to exempt transportation facilities from 112(r) generally, including the 112(r)(1) general duty clause.

2. Because LNG facilities are not “stationary sources,” they cannot be subject to either the “general duty” clause or the RMP regulations

Section 112(r)(7)(B) and section 112(r)(1) both apply to “stationary sources,” and section 112(r)(2)(C) defines “stationary source” for purposes of section 112(r) generally. Neither section 112(r)(7)(B) nor section 112(r)(1) authorizes EPA to narrow the meaning of “stationary source” as it is used in that provision. Section 112(r)(7)(B) requires EPA to regulate only those “stationary sources” having more than a threshold quantity of a regulated substance, but the

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statutory definition of "stationary source" otherwise governs the applicability of the regulations. Section 112(r)(1) directly imposes a general duty of care on "stationary sources" with no narrowing of the universe of covered facilities. In implementing both section 112(r)(7)(B) and section 112(r)(1), EPA is thus applying the statutory definition of "stationary source."

Under standard rules of statutory construction, the Agency's ability to interpret the statutory definition of "stationary source" one way for section 112(r)(7)(B) and another way for section 112(r)(1) is limited. For EPA to adopt different interpretations of "stationary source" for different provisions of section 112(r), there must be statutory support for different interpretations and a reasonable explanation for the difference. No such support or explanation exists here. Nothing in the statute or its legislative history suggests that Congress intended "stationary source" as defined by section 112(r)(2)(C) to be interpreted differently for different provisions of section 112(r). In fact, as discussed above, the legislative history indicates just the opposite.

Moreover, in promulgating, and later revising, the regulatory definition of "stationary source," EPA did not suggest that it was narrowly interpreting the statutory definition of that term for purposes of the RMP regulations. The Agency explained that excluding transportation and storage incident to transportation would make CAA section 112(r) consistent with EPCRA, and its legislative antecedent. In response to a commenter, EPA expressly acknowledged that the regulatory definition of "stationary source" was consistent with congressional intent. EPA provided no explanation of why, as a policy matter, transportation and storage incident to transportation should be excluded from the RMP regulations and not from the other provisions of section 112(r), including the general duty clause.

Presumably, such an explanation would have been critical in light of the section 112(r)(7)(B) requirements that the RMP regulations cover "storage" and "provide, to the greatest extent practicable" for the prevention and mitigation of accidental releases from "stationary sources." A regulatory definition of "stationary source" that excluded transportation and storage incident to transportation arguably would have been inconsistent with those statutory directives, and thus would have required a reasoned explanation to provide an adequate basis for the regulatory exemption. The only explanation EPA gave of the legal basis for the regulatory definition of "stationary source" was that it is consistent with congressional intent as revealed in legislative history. Thus, there is no basis in the rulemaking record of the RMP regulations to suggest now that EPA intended to narrowly interpret the statutory definition of "stationary source" only for regulatory purposes.³ As such, the Agency cannot now advance such an

³ Thus, this situation is distinguishable from the Resource Conservation and Recovery Act (RCRA) context in which EPA defined the term "solid waste" for regulatory purposes more

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argument simply to support an effort to justify subjecting LNG facilities to the 112(r) general duty clause. Even assuming that the CAA afforded EPA the discretion to define "stationary source" differently for purposes of sections 112(r)(1) and 112(r)(7), the Agency would have to undertake rulemaking to accomplish what effectively would be a reversal of its initial interpretation of section 112(r)(C)(2).

Conclusion

To the extent LNG facilities transport, or store incident to transport, regulated substances or extremely hazardous substances, they are exempt from CAA section 112(r), including the section 112(r)(1) general duty clause and the section 112(r)(7) RMP regulations. The legislative history of section 112(r) is clear that Congress intended to exclude from the statutory definition of "stationary source," and thus from regulation under 112(r) generally, facilities, like LNG facilities, that transport, or store incident to such transport, extremely hazardous substances. If you have any questions, please call me, Chet Thompson, or Nancy Ketcham-Colwill of my staff.

narrowly than the statutory definition. *See* RCRA § 1004(27) and 40 C.F.R. pt 261.2. In that situation, EPA was exercising its regulatory discretion to more narrowly define a statutory term for regulatory purposes. Here, by contrast, EPA adopted for regulatory purposes the statutory definition of stationary source. Had EPA adopted a regulatory definition of stationary source that included transportation facilities, it would have effectively expanded the statutory definition, not narrowed it.

MEMORANDUM

**SUBJECT: Southern California Gas Company Methane Gas Release
Aliso Canyon Natural Gas Storage Facility**

**FROM: Jared Blumenfeld
Regional Administrator, Region 9**

**TO: Matthew Fritz
Chief of Staff**

Overview: On 23 October 2015, an uncontrolled natural gas release was discovered at the Southern California Gas Company (SoCal Gas) Natural Gas Storage Facility at Aliso Canyon, an old oil field in Los Angeles County. SoCal Gas injects natural gas into abandoned oil reservoirs for storage and then withdraws the gas for transmission and sale. SoCal Gas is a subsidiary of Sempra Energy Utilities.

The Aliso Canyon storage facility contains 115 gas withdrawal/injection wells. The leaking well is over 8000 feet deep. Aliso Canyon has a total storage capacity of 86 bcf (billion cubic feet), the second largest natural gas storage facility in the United States.

Porter Ranch, an residential community of approximately 30,000 people, is located 1 mile away. More than 1,800 families have been relocated by the gas company and 1,000 remain on a waiting list. Two local elementary schools with nearly 2,000 schoolchildren and staff are slated to be moved to other schools in January.

Current Status: SoCal Gas is the responsible party and is attempting to plug the leaking well with a team of well-control contractors. SoCal Gas is working to kill the well from the top and drilling relief wells to kill the well from the bottom. SoCal has 157 people in their Incident Action Plan working on this relief effort.

SoCal Gas has attempted multiple 'top kill' operations, none successful. They are concerned about degrading the integrity of the well bore. The next effort will pump material such as ball bearings in heavy mud down the wellbore in an attempt to stop the flow of gas.

SoCal Gas is drilling two relief wells. The relief well, if successful, will intercept the bottom of the leaking well and pump in cement. This technique has had great success in controlling blow outs. The drilling operation continues around the clock and the relief wells are estimated to take 3-4 months to complete.

Environmental and Public Health Issues: Estimates of how much methane is leaking are not particularly reliable but are reported to be on the order of 2-3 million pounds per day. Measurements of methane in nearby residential areas show levels substantially below the flammability limit and that do not represent an acute health risk. However, exposure to the mercaptan odorant additive in the natural gas can produce symptoms such as nausea, headaches, vomiting, abdominal discomfort, respiratory irritation and dizziness. Residents have reported effects consistent with short term mercaptan exposure. The LA County Department of Public Health has determined that the emissions from this incident are causing health effects to some Porter Ranch residents and is requiring that SoCal Gas provide temporary relocation “As the duration of exposure increases, these trace levels can produce significant long-term health effects,” said Department of Public Health Interim Director Cynthia Harding. “As this incident has moved from a short-term exposure event resolved within days, to now a long-term event potentially lasting months, supplemental monitoring of potentially harmful trace chemicals is warranted.”

Regulatory Actions:

State Agencies: Division of Oil, Gas and Geothermal Resources (DOGGR), Department of Conservation, Natural Resources Agency; California Public Utility Commission (CPUC); California Office of Emergency Services (OES); California Environmental Protection Agency (Cal/EPA).

Local Agencies: Los Angeles County Certified Unified Program Agency (LA County CUPA) Los Angeles County Fire/HazMat; City of Los Angeles; South Coast Air Quality Management District (SCAQMD); Los Angeles County Department of Public Health

DOGGR has issued two orders to SoCal Gas, to provide information on the leaking well (18 November) and to develop plans for expeditiously capturing the escaping gas, stopping the leak and communicating with state and local regulators (10 December). The 10 December order includes the convening of experts from the national laboratories (Lawrence Berkeley, Lawrence Livermore and Sandia) to review data and assist DOGGR in evaluating SoCal Gas’s plans for stopping the leak.

The CPUC is conducting an investigation to assess SoCal Gas actions before and after the well failure that resulted in the methane gas release. This includes public notification and issues related to operation and maintenance of the storage facility. CPUC has requested information from SoCal Gas and, in coordination with DOGGR, directed SoCal Gas to hire an independent third party to conduct a root-cause analysis of the well blow-out.

The Los Angeles County Department of Public Health ordered SoCal Gas to provide temporary relocation to residents. As of December 1st, 778 households had either relocated (282) or were in

the process of relocating (496). SoCal Gas has established a community center in Porter Ranch to answer questions and assist residents with temporary relocation and claims.

The Los Angeles City Attorney announced a lawsuit against SoCal Gas for its handling of the methane leak and the SCAQMD has cited SoCal Gas for a public nuisance due to the odors from the mercaptan additive.

Cal/EPA has contacted the Interagency Modeling and Atmospheric Assessment Center (IMAAC) for possible assistance in modeling the methane dispersion. IMAAC is a federal interagency group with expertise in plume and atmospheric modeling.

Federal Actions:

The Region is participating in daily operational calls and providing daily summaries. On 15 December, two on-scene coordinators participated in a site tour with the Los Angeles County Fire and Hazardous Materials Unit and Lawrence Livermore National Laboratory. The most direct federal authority is held by the Department of Transportation, Office of Pipeline and Hazardous Materials Safety Administration. However the DOT authority has been delegated to California and it is not clear what action DOT is willing to take in this case.

[REDACTED]

[REDACTED]

On 18 December the Region issued an information request to SoCal Gas pursuant to the Clean Air Act Section 114.

Congressional Interest:

Region 9 is drafting a response to a letter from Congressman Sherman who is requesting an active EPA role in the response. We have also responded to inquiries from Senator Boxer's office.

[REDACTED]